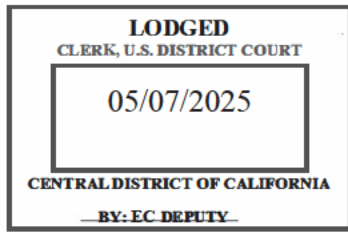


AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original ☐ Duplicate Original

UNITED STATES DISTRICT COURT

for the

Central District of California

United States of America,
v.

ALEJANDRO CAMPOS-ORNELAS,

Defendant(s)

Case No. 8:25-mj-00365

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of May 5, 2025 in the county of Orange in the Central District of California, the

defendant(s) violated:

Code Section
8 U.S.C. §1326(a)

Offense Description
Illegal Alien Found in the United
States Following Deportation or
Removal

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.

/s/

Complainant's signature

JASMIN GARIBAY, Special Agent, DHS, ICE, HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 05/07/2025

/s/ Autumn D. Spaeth

Judge's signature

City and state: Santa Ana, California

Hon. AUTUMN D. SPAETH, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Special Agent Jasmin Garibay, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against ALEJANDRO CAMPOS-ORNELAS ("CAMPOS") charging him with violating Title 8, United States Code, Sections 1326(a), Illegal Alien Found in the United States Following Deportation or Removal.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF SPECIAL AGENT JASMIN GARIBAY

3. I am a Special Agent ("SA") with the United States Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"), and have been since April 21, 2024. I am currently assigned to the Orange County field office.

III. STATEMENT OF PROBABLE CAUSE

4. On or about March 15, 2020, the HSI Tip Line received an anonymous tip concerning an alleged previously deported

illegal alien living at a specific address in Anaheim, California [Address #1]¹, identified as ALEJANDRO CAMPOS-ORNELAS. An Investigative Referral was completed, pending the attention of an immigration officer and/or agent for further investigation.

5. On March 19, 2025, I conducted a review of HSI records and database checks to identify and locate previously removed illegal aliens who may be currently residing within the Orange County area. Database checks revealed CAMPOS as a national and citizen of Mexico possibly residing at a different address in Anaheim, California [Address #2]. Further database checks revealed CAMPOS is not authorized to be present in the United States after having been previously removed.

6. On or about May 05, 2025, I and one other Special Agent conducted surveillance at Address #2. At approximately 3:50 p.m., I witnessed an adult male matching CAMPOS's physical description, to include approximate height and weight, exit the apartment complex located at Address #2 and proceeded to cut grass in the front lawn. To conduct this comparison, I used CAMPOS' photograph from his most recent immigration removal encounter dated September 24, 2015.

7. Based on my training and experience, I know that a DHS "A-File" is a file in which immigration records are maintained for aliens admitted to or found in the United States. I also know that a DHS A-File usually contains photographs,

¹ The full residential address is not being included in accordance with the Court's local rules.

fingerprints, court records of conviction, and records relating to deportation or other actions by INS or DHS with respect to the subject alien for whom the DHS A-File is maintained.

8. On or about March 26, 2025, I obtained and reviewed DHS A-File A077-301-032 (the "DHS A-File"), which is maintained for CAMPOS. The DHS A-File contained the following documents and information:

a. Photographs of CAMPOS. I compared the DHS A-File photographs of CAMPOS to the person I saw cutting grass in the front lawn on May 05, 2025, and believe it to be the same person.

b. The following documents related to CAMPOS's removal:

i. A Decision and Order of the Immigration Judge ordering CAMPOS removed to Mexico by Immigration Judge Kenneth A. Bagley, on October 24, 2000.

ii. An executed Notice to Alien Ordered Removed/Departure Verification showing CAMPOS was removed from the United States on October 24, 2000, via San Ysidro, California.

iii. An executed Warrant of Removal showing CAMPOS was removed from the United States on September 01, 2015, via San Ysidro, California.

iv. An executed Warrant of Removal showing CAMPOS was removed from the United States on April 02, 2002, via San Ysidro, California.

v. An executed Warrant of Removal showing CAMPOS was removed from the United States on July 25, 2001, via Calexico, California.

vi. An executed Warrant of Removal showing CAMPOS was removed from the United States on May 17, 2001, via San Ysidro, California.

vii. I know from my training and experience that a Departure Verification or a Warrant of Removal is executed each time a subject alien is removed and excluded from the United States by ICE (and its predecessor agency, INS) and usually contains the subject's photograph, signature, and fingerprint. The executed Departure Verification and Warrants of Removal/Deportation in the DHS A-File contained CAMPOS's photograph, signature, and fingerprint.

c. Law enforcement records show that on or about March 19, 1997, CAMPOS was convicted of Participate in Criminal Street Gang, in violation of California Penal Code Section 186.22(A), in the Superior Court of the State of California, County of Orange, North Justice Center, Case Number AN97NM02458, for which CAMPOS received a sentence of 30 days in jail.

d. A Record of Sworn Statement in Affidavit Form dated September 29, 2000, in which CAMPOS admitted he was born in and is a citizen of Mexico.

e. On or about March 19, 2025, I reviewed the printouts of ICE computer indices on CAMPOS. Based on my training and experience, I know that the ICE computer indices track and document each time an alien is deported or excluded

from the United States by ICE, was deported or excluded by the former INS, or is granted permission to enter or re-enter the United States. The ICE computer indices confirmed that CAMPOS had been removed, deported, and/or excluded on the dates indicated on the Departure Verification and Warrants of Removal/Deportation, found in the DHS A-File. The ICE computer indices further indicated that CAMPOS had not applied for, or obtained from the Attorney General or the Secretary of Homeland Security, permission to re-enter the United States.

9. Based on my review of the DHS A-File, I determined that it does not contain any record of CAMPOS ever applying for, or receiving from the Attorney General or the Secretary of Homeland Security, permission to re-enter the United States. Based on my training and experience, I know that such documentation is required to re-enter the United States legally after deportation or removal, and that if such documentation existed, it would ordinarily be found in the DHS A-File.

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IV. CONCLUSION

10. For all the reasons described above, there is probable cause to believe that ALEJANDRO CAMPOS-ORNELAS has committed a violation of Title 8, United States Code, Sections 1326(a), Illegal Alien Found in the United States Following Deportation or Removal.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 7 day of May
2025.

/s/ Autumn D. Spaeth
THE HONORABLE AUTUMN D. SPAETH
UNITED STATES MAGISTRATE JUDGE